UNITED STATES DISTRICT COURT

for the

< Northern > DISTRICT OF < New York

<Name(s) of plaintiff(s)>,

Plaintiff(s)

Dr. Marco A.V. Bitetto

v.

<Name(s) of defendant(s)>,

Defendant(s)

Ginni Romitty, CEO, IBM Corporation

Civil Action No. <Number>

1:17-CV-658
LEK/DJS

COMPLAINT FOR COPYRIGHT INFRINGEMENT AND UNFAIR COMPETITION

1. **<Statement of Jurisdiction. See Form 7.>**

<a. For diversity-of-citizenship jurisdiction.> The plaintiff is [a citizen of State A] [a corporation incorporated under the laws of State A with its principal place of business in State A]. The defendant is [a citizen of State B] [a corporation incorporated under the laws of State B with its principal place of business in State B]. The amount in controversy, without interest and costs, exceeds the sum or value specified by 28 U.S.C. § 1332.

<b. For federal-question jurisdiction.> This action arises under [the United States Constitution; specify the article or amendment and the section] [a United States treaty; specify] [a federal statute, ___U.S.C. § ___].

<c. For a claim in the admiralty or maritime jurisdiction.> This is a case of admiralty or maritime jurisdiction. ***<To invoke admiralty status under Rule 9(h) use the following:*** This is an admiralty or maritime claim within the meaning of Rule 9(h).>

2. Before 16 June 2017 , the plaintiff, a United States citizen, wrote a book entitled NERVOTRON: A Functional Silicon Analog to the Neuron.

3. The book is an original work that may be copyrighted under United States law. A copy of the book is attached as Exhibit A.

4. Between 16 June 2017 and 15 September 1995, the plaintiff applied to the copyright office and received a certificate of registration dated 15 September 2017 and identified as 15 September 2017, Text, TX0004303621.

5. Since 15 September 2017, the plaintiff has either published or licensed for publication all

copies of the book in compliance with the copyright laws and has remained the sole owner of the copyright.

6. After the copyright was issued, the defendant infringed the copyright by using, publishing and selling rights to use material from NERVOTRON: A Functional Silicon Analog to the Neuron, which was copied largely from the plaintiff's book. A copy of the defendant's book is attached as Exhibit B.

7. The plaintiff has notified the defendant in writing of the infringement.

8. The defendant continues to infringe the copyright by continuing to publish and sell the infringing book in violation of the copyright, and further has engaged in unfair trade practices and unfair competition in connection with its publication and sale of the infringing book, thus causing irreparable damage.

Therefore, the plaintiff demands that:

(a) until this case is decided the defendant and the defendant's agents be enjoined from disposing of any copies of the defendant's book by sale or otherwise;

(b) the defendant account for and pay as damages to the plaintiff all profits and advantages gained from unfair trade practices and unfair competition in selling the defendant's book, and all profits and advantages gained from infringing the plaintiff's copyright (but no less than the statutory minimum);

(c) the defendant deliver for impoundment all copies of the book in the defendant's possession or control and deliver for destruction all infringing copies and all plates, molds, and other materials for making infringing copies;

(d) the defendant pay the plaintiff interest, costs, and reasonable attorney's fees; and

(e) the plaintiff be awarded any other just relief.

Date: 16 June 2017

<Signature of attorney or unrepresented party>

Dr. Marco A.V. Bitetto
<Printed name>
4 Fourth Avenue
Rensselaer, New York 12144
<Address>
drmbitetto@verizon.net
<E-mail address>
(917)780-2379
<Telephone number>

Public Catalog

Copyright Catalog (1978 to present)
Search Request: Left Anchored Title = NERVOTRON: A FUNCTIONAL SILICON ANALOG TO THE NEURON
Search Results: Displaying 1 of 1 entries

previous next

Nervotron : a functional silicon analog to the neuron.

Type of Work: Text
Registration Number / Date: TX0004303621 / 1996-03-06
Title: Nervotron : a functional silicon analog to the neuron.
Description: Microfiche.
Copyright Claimant: Marco Antonio V. Bitetto
Date of Creation: 1994
Date of Publication: 1995-09-15
Names: Bitetto, Marco Antonio V.

ProQuest

Citation/Abstract

NERVOTRON: A functional silicon analog to the neuron

1994 1994

Abstract (summary)

NERVOTRONS are silicon based analogs of biological neurons that are in effect capable of reacting in many of the same analogous modes of operations as the currently understood models of neurons. The theory behind such analogous processing units is discussed along with a discussion of how hardware analogs can be made to form auto-programming networks via the use of closed loop feedback methods of the PID (Proportional Integral Derivative) variety and/or use of Markovian Renormalization error minimization techniques. A collection of idealized interconnection networks of NERVOTRONS are described and techniques are discussed for the actualization of these idealized networks in silicon. Computerized simulation models are included for the basic processing models of the NERVOTRON and a method of determining how long it would take a NERVOTRONIC control system to eliminate a perturbation from the actual signal input. This dissertation concludes with a discussion of the future potential of NERVOTRONIC technology to mankind, current limitations and future development. Included are discussions on the topics of: Thinking, Learning and Creativity; Cognitron Theory; Reading Machine; Talking; Exploder; Specifications of Recommended Components; Renormalization Theory and Concepts and Markovian Renormalization; Simulation Programs; and Analysis of the Functional Anatomy of the Human Brain.

Indexing (details)

Subject	Electrical engineering; Computer science; Artificial intelligence
Classification	0544: Electrical engineering 0984: Computer science 0800: Artificial intelligence
Identifier / keyword	Applied sciences, machine learning
Title	NERVOTRON: A functional silicon analog to the neuron
Author	Bitetto, Marco Antonio V.
Pages	254 p.
Number of pages	254
Publication year	1994
Degree date	1994
School code	1033
Source	DAI-B 56/03, p. 1598, Sep 1995
Place of publication	Ann Arbor
Country of publication	United States
Advisor	Jack, Hulan, Jr, Pruscia, Vito
University/institution	The Union Institute
University location	United States -- Ohio
Degree	Ph.D.
Source type	Dissertations & Theses
Language	English
Document type	Dissertation/Thesis
Dissertation/thesis number	9522949
ProQuest document ID	304178747
Copyright	Copyright UMI - Dissertations Publishing 1994
Document URL	http://search.proquest.com/docview/304178747

^ Back to top